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22 IN THE UNITED STATES DISTRICT COURT  
23 FOR THE DISTRICT OF ARIZONA  
24

25 In re Bard IVC Filters Products  
26 Liability Litigation

NO. MD-15-02641-PHX-DGC

**STIPULATION RE PROPOSED CASE  
MANAGEMENT ORDER FOR  
DEFENDANTS' EXPEDITED ESI  
PRODUCTION**

1 In accordance with their discussion with the Court regarding ESI issues, the Parties  
2 hereby submit, and stipulate to entry of, Proposed Case Management Order No. 17  
3 regarding Defendant's expedited ESI production process.

4 A copy of the proposed case management order is attached as Exhibit "A".

5 DATED this 9th day of September 2016.

6 **ATTORNEYS FOR PLAINTIFFS**

**ATTORNEYS FOR DEFENDANTS**

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17 **CERTIFICATE OF SERVICE**

18 I hereby certify that on this 9<sup>th</sup> day of September, 2016, I electronically transmitted  
19 the attached document to the Clerk's Office using the CM/ECF System for filing and  
20 transmittal of a Notice of Electronic Filing.

21  
22 /s/ Deborah Yanazzo

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